

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

March 16 20 23  
By Ravi Subramanian, Clerk  
Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

1. JESSE JAMES BAILEY,
2. THOMAS CARVER,
3. BRYSON GILL,
4. YEHOSHUA KILP,
5. GUSTAVO CASTELLANOS-TAPIA,
6. CANDACE BAILEY,
7. RONALDO MCCOMB,
8. KEAGEN LARSEN,
9. SEAN MOINETTE,
10. GREGORY BEERS,
11. MICHAEL SLOCUMB,
12. MICHAEL WARREN,
13. ISAAC CERVANTES,
14. SARA THOMPSON,
15. ERIC SMITH,
16. SHAWN ELLIS,
17. JOSEPH HEMPEL,
18. STEPHANIE YEPEZ,
19. PHILIP BOORKMAN,
20. C'LA MORALES,

NO **CR23-5085** DGE  
INDICTMENT

21. RONNIE GRIFFIN,  
22. DANIEL HAMMOND,  
23. ANNA SARNES,  
24. ANTHONY ESCOTO,  
25. WILLIAM TRIPP,  
26. DANA HANSON, and  
27. JUSTIN HANSON,

Defendants.

The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Distribute Controlled Substances)**

Beginning at a time unknown, and continuing until at least March 16, 2023, in Pierce, Mason, Clark, and King Counties, within the Western District of Washington, and elsewhere, JESSE JAMES BAILEY, THOMAS CARVER, BRYSON GILL, YEHOSHUA KILP, GUSTAVO CASTELLANOS-TAPIA, CANDACE BAILEY, RONALDO MCCOMB, KEAGEN LARSEN, SEAN MOINETTE, GREGORY BEERS, MICHAEL SLOCUMB, MICHAEL WARREN, ISAAC CERVANTES, SARA THOMPSON, ERIC SMITH, SHAWN ELLIS, JOSEPH HEMPEL, STEPHANIE YEPEZ, PHILIP BOORKMAN, C'LA MORALES, RONNIE GRIFFIN, DANIEL HAMMOND, ANNA SARNES, ANTHONY ESCOTO, WILLIAM TRIPP, DANA HANSON, and JUSTIN HANSON, and others known and unknown, did knowingly and intentionally conspire to distribute controlled substances, including: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), methamphetamine, heroin, and cocaine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that with respect to JESSE JAMES BAILEY, THOMAS CARVER, BRYSON GILL, YEHOSHUA KILP, CANDACE BAILEY, RONALDO MCCOMB, KEAGEN LARSEN, SEAN MOINETTE, GREGORY BEERS,

1 MICHAEL SLOCUMB, MICHAEL WARREN, ISAAC CERVANTES,  
 2 SARA THOMPSON, ERIC SMITH, JOSEPH HEMPEL, STEPHANIE YEPEZ,  
 3 PHILIP BOORKMAN, C'LA MORALES, RONNIE GRIFFIN, DANIEL HAMMOND,  
 4 ANTHONY ESCOTO, WILLIAM TRIPP, DANA HANSON, and JUSTIN HANSON,  
 5 their conduct as members of the conspiracy charged in Count 1, which includes the  
 6 reasonably foreseeable conduct of other members of the conspiracy charged in Count 1,  
 7 involved 400 grams or more of a mixture and substance containing a detectable amount  
 8 of fentanyl, in violation of Title 21, United States Code, Sections 841(b)(1)(A).

9 The Grand Jury further alleges that with respect to JESSE JAMES BAILEY,  
 10 THOMAS CARVER, BRYSON GILL, YEHOSHUA KILP, GUSTAVO  
 11 CASTELLANOS-TAPIA, CANDACE BAILEY, RONALDO MCCOMB,  
 12 KEAGEN LARSEN, SEAN MOINETTE, GREGORY BEERS, MICHAEL SLOCUMB,  
 13 MICHAEL WARREN, ISAAC CERVANTES, SARA THOMPSON, ERIC SMITH,  
 14 SHAWN ELLIS, JOSEPH HEMPEL, STEPHANIE YEPEZ, PHILIP BOORKMAN,  
 15 C'LA MORALES, RONNIE GRIFFIN, DANIEL HAMMOND, ANNA SARNES,  
 16 ANTHONY ESCOTO, WILLIAM TRIPP, DANA HANSON, and JUSTIN HANSON,  
 17 their conduct as members of the conspiracy charged in Count 1, which includes the  
 18 reasonably foreseeable conduct of other members of the conspiracy charged in Count 1,  
 19 involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers,  
 20 and 500 grams or more of a mixture or substance containing a detectable amount of  
 21 methamphetamine, in violation of Title 21, United States Code, Sections 841(b)(1)(A).

22 The Grand Jury further alleges that with respect to JESSE JAMES BAILEY,  
 23 THOMAS CARVER, BRYSON GILL, YEHOSHUA KILP, CANDACE BAILEY,  
 24 RONALDO MCCOMB, KEAGEN LARSEN, SEAN MOINETTE, GREGORY BEERS,  
 25 MICHAEL SLOCUMB, MICHAEL WARREN, ISAAC CERVANTES,  
 26 SARA THOMPSON, ERIC SMITH, JOSEPH HEMPEL, STEPHANIE YEPEZ,  
 27 C'LA MORALES, RONNIE GRIFFIN, ANTHONY ESCOTO, WILLIAM TRIPP,

1 DANA HANSON, and JUSTIN HANSON, their conduct as members of the conspiracy  
 2 charged in Count 1, which includes the reasonably foreseeable conduct of other members  
 3 of the conspiracy charged in Count 1, involved 1,000 grams or more of a mixture or  
 4 substance containing a detectable amount of heroin, in violation of Title 21, United States  
 5 Code, Sections 841(b)(1)(A).

6 All in violation of Title 21, United States Code, Sections 846, 841(a)(1) and  
 7 841(b)(1)(A).

## 8 COUNT 2

### 9 **(Possession of a Controlled Substance with Intent to Distribute)**

10 On or about February 7, 2022, in Lewis County within the Western District of  
 11 Washington, RONALDO MCCOMB did knowingly and intentionally possess, with the  
 12 intent to distribute, and aid and abet the possession of, with the intent to distribute, a  
 13 controlled substance, including: fentanyl and heroin, substances controlled under  
 14 Title 21, United States Code.

15 The Grand Jury further alleges that the offense involved 40 grams or more of a  
 16 mixture and substance containing a detectable amount of fentanyl.

17 The Grand Jury further alleges that the offense involved 100 grams or more of a  
 18 mixture and substance containing a detectable amount of heroin.

19 The Grand Jury further alleges that this offense was committed during and in  
 20 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
 21 Substances).

22 All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)  
 23 (B), and Title 18, United States Code, Section 2.

## 24 COUNT 3

### 25 **(Possession of a Controlled Substance with Intent to Distribute)**

26 On or about February 11, 2022, in Pierce County, within the Western District of  
 27 Washington, JESSE JAMES BAILEY and CANDACE BAILEY did knowingly and

1 intentionally possess, with the intent to distribute, and aid and abet the possession of,  
2 with the intent to distribute, a controlled substance, including: fentanyl and  
3 methamphetamine, substances controlled under Title 21, United States Code.

4 The Grand Jury further alleges that the offense involved 400 grams or more of a  
5 mixture and substance containing a detectable amount of fentanyl.

6 The Grand Jury further alleges that the offense involved 50 grams or more of  
7 methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a  
8 mixture or substance containing a detectable amount of methamphetamine, its salts,  
9 isomers, or salts of its isomers.

10 The Grand Jury further alleges that this offense was committed during and in  
11 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
12 Substances).

13 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
14 841(b)(1)(A), and Title 18, United States Code, Section 2.

#### 15 COUNT 4

#### 16 **(Possession of a Controlled Substance with Intent to Distribute)**

17 On or about July 31, 2022, in Pierce County, within the Western District of  
18 Washington, YEHOSHUA KILP and STEPHANIE YEPEZ did knowingly and  
19 intentionally possess, with the intent to distribute, and aid and abet the possession of,  
20 with the intent to distribute, a controlled substance, including: fentanyl,  
21 methamphetamine, and heroin, substances controlled under Title 21, United States Code.

22 The Grand Jury further alleges that the offense involved 400 grams or more of a  
23 mixture and substance containing a detectable amount of fentanyl.

24 The Grand Jury further alleges that the offense involved 50 grams or more of  
25 methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a  
26 mixture or substance containing a detectable amount of methamphetamine, its salts,  
27 isomers, or salts of its isomers.

1 The Grand Jury further alleges that this offense was committed during and in  
2 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
3 Substances).

4 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
5 841(b)(1)(A), and Title 18, United States Code, Section 2.

6 **COUNT 5**

7 **(Possession of a Controlled Substance with Intent to Distribute)**

8 On or about August 11, 2022, in Pierce County, within the Western District of  
9 Washington, YEHOASHUA KILP and SARA THOMPSON did knowingly and  
10 intentionally possess, with the intent to distribute, and aid and abet the possession of,  
11 with the intent to distribute, a controlled substance, including: fentanyl,  
12 methamphetamine, heroin, and cocaine, substances controlled under Title 21, United  
13 States Code.

14 The Grand Jury further alleges that the offense involved 400 grams or more of a  
15 mixture and substance containing a detectable amount of fentanyl.

16 The Grand Jury further alleges that the offense involved 50 grams or more of  
17 methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a  
18 mixture or substance containing a detectable amount of methamphetamine, its salts,  
19 isomers, or salts of its isomers.

20 The Grand Jury further alleges that this offense was committed during and in  
21 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
22 Substances).

23 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
24 841(b)(1)(A), and Title 18, United States Code, Section 2.

25 //

26 //



**COUNT 6****(Possession of a Controlled Substance with Intent to Distribute)**

On or about December 9, 2022, in Mason County, within the Western District of Washington, BRYSON GILL, MICHAEL SLOCUMB, MICHAEL WARREN, and ISAAC CERVANTES did knowingly and intentionally possess, with the intent to distribute, and aid and abet the possession of, with the intent to distribute, a controlled substance, including: fentanyl, methamphetamine, and heroin, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture and substance containing a detectable amount of fentanyl.

The Grand Jury further alleges that the offense involved 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers.

The Grand Jury further alleges that the offense involved 100 grams or more of a mixture and substance containing a detectable amount of heroin.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and (B), and Title 18, United States Code, Section 2.

**COUNT 7****(Possession of a Controlled Substance with Intent to Distribute)**

On or about December 9, 2022, in Pierce County, within the Western District of Washington, MICHAEL SLOCUMB did knowingly and intentionally possess, with the intent to distribute, and aid and abet the possession of, with the intent to distribute, a

1 controlled substance, including: fentanyl, a substance controlled under Title 21, United  
2 States Code.

3 The Grand Jury further alleges that this offense was committed during and in  
4 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
5 Substances).

6 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
7 841(b)(1)(C), and Title 18, United States Code, Section 2.

8 **COUNT 8**

9 **(Possession of a Controlled Substance with Intent to Distribute)**

10 On or about December 14, 2022, in Pierce County, within the Western District of  
11 Washington, JESSE JAMES BAILEY, THOMAS CARVER, and ANNA SARNES, did  
12 knowingly and intentionally possess, with the intent to distribute, and aid and abet the  
13 possession of, with the intent to distribute, a controlled substance, including: fentanyl,  
14 methamphetamine, and heroin, substances controlled under Title 21, United States Code.

15 The Grand Jury further alleges that the offense involved 400 grams or more of a  
16 mixture and substance containing a detectable amount of fentanyl.

17 The Grand Jury further alleges that the offense involved 50 grams or more of  
18 methamphetamine, its salts, isomers, or salts of its isomers.

19 The Grand Jury further alleges that this offense was committed during and in  
20 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
21 Substances).

22 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
23 841(b)(1)(A), and Title 18, United States Code, Section 2.

24 **COUNT 9**

25 **(Possession of a Controlled Substance with Intent to Distribute)**

26 On or about December 14, 2022, in Pierce County, within the Western District of  
27 Washington, THOMAS CARVER, ANTHONY ESCOTO, and WILLIAM TRIPP, did



1 knowingly and intentionally possess, with the intent to distribute, and aid and abet the  
2 possession of, with the intent to distribute, a controlled substance, including: fentanyl,  
3 methamphetamine, and heroin, substances controlled under Title 21, United States Code.

4 The Grand Jury further alleges that the offense involved 50 grams or more of  
5 methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a  
6 mixture or substance containing a detectable amount of methamphetamine, its salts,  
7 isomers, or salts of its isomers.

8 The Grand Jury further alleges that the offense involved 40 grams or more of a  
9 mixture and substance containing a detectable amount of fentanyl.

10 The Grand Jury further alleges that this offense was committed during and in  
11 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
12 Substances).

13 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
14 841(b)(1)(A) and (B), and Title 18, United States Code, Section 2.

15 **COUNT 10**

16 **(Possession of a Controlled Substance with Intent to Distribute)**

17 On or about December 15, 2022, in Pierce County, within the Western District of  
18 Washington, GUSTAVO CASTELLANOS-TAPIA did knowingly and intentionally  
19 possess, with the intent to distribute, a controlled substance, including:  
20 methamphetamine, a substance controlled under Title 21, United States Code.

21 The Grand Jury further alleges that the offense involved 50 grams or more of  
22 methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a  
23 mixture or substance containing a detectable amount of methamphetamine, its salts,  
24 isomers, or salts of its isomers.

25 The Grand Jury further alleges that this offense was committed during and in  
26 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
27 Substances).

1 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
2 841(b)(1)(A).

3 **COUNT 11**

4 **(Attempted Possession of a Controlled Substance with Intent to Distribute)**

5 On or about December 15, 2022, in Pierce County, within the Western District of  
6 Washington, THOMAS CARVER did knowingly and intentionally attempt to possess,  
7 with the intent to distribute, a controlled substance, including: methamphetamine, a  
8 substance controlled under Title 21, United States Code.

9 The Grand Jury further alleges that the offense involved 50 grams or more of  
10 methamphetamine, its salts, isomers, or salts of its isomers, and 500 grams or more of a  
11 mixture or substance containing a detectable amount of methamphetamine, its salts,  
12 isomers, or salts of its isomers.

13 The Grand Jury further alleges that this offense was committed during and in  
14 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
15 Substances).

16 All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and  
17 841(b)(1)(A).

18 **COUNT 12**

19 **(Possession of a Controlled Substance with Intent to Distribute and Distribution)**

20 On or about January 30, 2023, in Clark County, within the Western District of  
21 Washington, and elsewhere, RONALDO MCCOMB did knowingly and intentionally  
22 possess, with the intent to distribute, and did knowingly and intentionally distribute, a  
23 controlled substance, including: fentanyl, a substance controlled under Title 21, United  
24 States Code.

25 The Grand Jury further alleges that the offense involved 400 grams or more of a  
26 mixture and substance containing a detectable amount of fentanyl.  
27

1 The Grand Jury further alleges that this offense was committed during and in  
 2 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled  
 3 Substances).

4 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
 5 841(b)(1)(A).

### 6 FORFEITURE ALLEGATION

7 The allegations contained in Counts 1 through 12 of this Indictment are hereby  
 8 realleged and incorporated by reference for the purpose of alleging forfeiture.

9 Upon conviction of the offense alleged in Count 1 JESSE JAMES BAILEY,  
 10 THOMAS CARVER, BRYSON GILL, YEHOSHUA KILP, GUSTAVO  
 11 CASTELLANOS-TAPIA, CANDACE BAILEY, RONALDO MCCOMB,  
 12 KEAGEN LARSEN, SEAN MOINETTE, GREGORY BEERS, MICHAEL SLOCUMB,  
 13 MICHAEL WARREN, ISAAC CERVANTES, SARA THOMPSON, ERIC SMITH,  
 14 SHAWN ELLIS, JOSEPH HEMPEL, STEPHANIE YEPEZ, PHILIP BOORKMAN,  
 15 C'LA MORALES, RONNIE GRIFFIN, DANIEL HAMMOND, ANNA SARNES,  
 16 ANTHONY ESCOTO, WILLIAM TRIPP, DANA HANSON, and JUSTIN HANSON  
 17 shall each forfeit to the United States, pursuant to Title 21, United States Code, Section  
 18 853, any property that constitutes or is traceable to proceeds of the offense, as well as any  
 19 property that facilitated the offense. This property includes, but is not limited to:

- 20 a. a judgment for a sum of money (also known as a forfeiture money judgment)
- 21 in an amount representing the proceeds each defendant obtained, directly and
- 22 indirectly, as a result of such defendant's commission of the offense;
- 23 b. \$210,781 in United States currency, seized by the Federal Bureau of
- 24 Investigation ("FBI") on or about February 11, 2022;
- 25 c. \$2,365.00 in United States currency, seized by the Drug Enforcement
- 26 Administration ("DEA") on or about August 11, 2022;
- 27

1 d. the following amounts of United States currency, seized by DEA on or about  
2 December 9, 2022:

- 3 • \$59,799.00;
- 4 • \$10,415.00;
- 5 • \$6,512.00;
- 6 • \$1,745.00;
- 7 • \$1,293.00;
- 8 • \$1,238.00; and
- 9 • \$34.00;

10 e. the following vehicles seized by DEA on or about December 9, 2022:

- 11 • one 2022 BMW X6, VIN: 5YMCY0C05N9N21792
- 12 • one 2020 GMC Sierra, VIN: 1GT49REY0LF195108
- 13 • one 2018 Dodge Charger, VIN: 2C3CDXL93JH328602;
- 14 • one 2012 Mercedes-Benz CLS; and
- 15 • one 2016 Polaris RZR;

16 f. the following firearms, firearm accessories, and ammunition seized by FBI on  
17 or about February 11, 2022:

- 18 • one Glock 17 pistol with Spartan laser attached, bearing serial number  
19 UEA064;
- 20 • one Glock 21 GMBH pistol, bearing serial number MRS587;
- 21 • one Mossberg 930 shotgun, bearing serial number AF0053945;
- 22 • one Sun City Machinery Co., Stevens 320 shotgun, bearing serial  
23 number 203102M;
- 24 • one Heckler & Koch P30 pistol, bearing serial number 219-026609;
- 25 • one Heckler & Koch HK416 rifle, bearing serial number HB022788;
- 26 • one Glock 19 pistol, bearing serial number BRF-B706;
- 27 • one Stream Light Flashlight (attached to Glock 19);

- one Aero Precision X15 rifle, bearing serial number X384302;
- one Vortex Viper Optic scope (attached to Aero Precision X15 rifle);
- one Aero Precision EPC-9 rifle, bearing serial number SF-011187;
- one Vortex Sparc Optic scope (attached to Aero Precision EPC-9 rifle);
- four suppressors;
- one Aero Precision EPC-9 rifle, bearing serial number SF-031095;
- one Surefire KM-1 flashlight (attached to Aero Precision EPC-9 rifle);
- one Aero Precision Betsy rifle, bearing serial number BRM4-0529;
- one Vortex Venom Optic scope / DBL-1 laser light (attached to Aero Precision Betsy rifle);
- one Aero Precision M5 rifle, bearing serial number US156538;
- one Aero Precision M4E1 rifle, bearing serial number M4-0230395;
- one Aero Precision Freedom rifle, bearing serial number 14481-July4;
- three bipods (attached to Aero Precision Freedom rifle, Aero Precision M5 rifle and Aero Precision X15 rifle);
- one Aero Precision X15 rifle, bearing serial number X332532;
- one Polymer 80 handgun, bearing an unknown serial number;
- one Black AR15 style rifle, bearing an unknown serial number;
- one Trijicon SRS Optic scope (attached to Black AR15 style rifle);
- any associated ammunition;
- one box of loaded and unloaded magazines; and
- one bag with miscellaneous gun parts and four gun boxes;

g. the following firearms, firearm accessories, and ammunition seized by DEA on or about December 9, 2022:

- one Sig Sauer SP2340 .40 caliber pistol with magazine and 33 rounds of ammunition;

- one Springfield Armory XDM Elite 10mm pistol with magazine and 13 rounds of ammunition;
  - one CZ 7.62x25 pistol with magazine and six rounds of ammunition;
  - one Panzer Arms BP-12 12-gauge shotgun with drum magazine and 16 rounds of ammunition;
  - on PW Arms Yugo M59/66 7.62x39 rifle;
  - one privately made firearm 7.62 caliber rifle with drum magazine and 25 rounds of ammunition;
  - one Mossberg 500 12-gauge shotgun;
  - one Smith and Wesson M&P 15 5.56 caliber rifle with magazine;
  - one Winchester 1300 12-gauge shotgun;
  - one Jennings Firearms J22 .22 caliber pistol with magazine and 6 rounds of ammunition;
  - one Iver Johnson Cycle Works .32 caliber revolver;
  - one Ruger Single Six .22 caliber revolver;
  - one R-Schmit Ostheim/Rhon Colt 6 .22 caliber revolver;
  - one Winchester 1400 20-gauge shotgun;
  - one Ruger 57 5.7x28 caliber pistol with magazine and 20 rounds of ammunition;
  - one Glock 17 9mm pistol with magazine and 17 rounds of ammunition;
  - one Ruger EC9 9mm pistol with magazine and seven rounds of ammunition; and
  - one American Tactical Omni Hybrid 5.56 pistol with magazine and 60 rounds of ammunition;
- h. one Glock 26 9mm pistol bearing serial number BEDF842 with two magazines and 30 rounds of ammunition, seized by DEA on or about December 14, 2022;



- i. the real property with address 50 County Road N9012, Concho, Arizona, 85924; and
- j. the real property with address 49 County Road N9012, Concho, Arizona, 85924.

Upon conviction of the offense alleged in Count 2, RONALDO MCCOMB shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

Upon conviction of the offense alleged in Count 3, JESSE JAMES BAILEY and CANDACE BAILEY shall each forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

Upon conviction of the offense alleged in Count 4, YEHOSHUA KILP and STEPHANIE YEPEZ shall each forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

Upon conviction of the offense alleged in Count 5, YEHOSHUA KILP and SARA THOMPSON shall each forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

Upon conviction of the offense alleged in Count 6, BRYSON GILL, MICHAEL SLOCUMB, MICHAEL WARREN, and ISAAC CERVANTES shall each forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to:

- a. the following vehicles seized by DEA on or about December 9, 2022:
  - one 2022 BMW X6, VIN: 5YMCY0C05N9N21792;

- one 2020 GMC Sierra, VIN: 1GT49REY0LF195108;
- one 2018 Dodge Charger, VIN: 2C3CDXL93JH328602;
- one 2012 Mercedes-Benz CLS; and
- one 2016 Polaris RZR;

b. the following firearms, firearm accessories, and ammunition seized by DEA on or about December 9, 2022:

- one Sig Sauer SP2340 .40 caliber pistol with magazine and 33 rounds of ammunition;
- one Springfield Armory XDM Elite 10mm pistol with magazine and 13 rounds of ammunition;
- one CZ 7.62x25 pistol with magazine and six rounds of ammunition;
- one Panzer Arms BP-12 12 gauge shotgun with drum magazine and 16 rounds of ammunition;
- one PW Arms Yugo M59/66 7.62x39 rifle;
- one privately made firearm 7.62 caliber rifle with drum magazine and 25 rounds of ammunition;
- one Mossberg 500 12-gauge shotgun;
- one Smith and Wesson M&P 15 5.56 caliber rifle with magazine;
- one Winchester 1300 12-gauge shotgun;
- one Jennings Firearms J22 .22 caliber pistol with magazine and six rounds of ammunition;
- one Iver Johnson Cycle Works .32 caliber revolver;
- one Ruger Single Six .22 caliber revolver;
- one R-Schmit Ostheim/Rhon Colt 6 .22 caliber revolver;
- one Winchester 1400 20-gauge shotgun;
- one Ruger 57 5.7x28 caliber pistol with magazine and 20 rounds of ammunition;

- one Glock 17 9mm pistol with magazine and 17 rounds of ammunition;
- one Ruger EC9 9mm pistol with magazine and seven rounds of ammunition; and
- one American Tactical Omni Hybrid 5.56 pistol with magazine and 60 rounds of ammunition;

Upon conviction of the offense alleged in Count 7, MICHAEL SLOCUMB shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to:

a. the following vehicles seized by DEA on or about December 9, 2022:

- one 2018 Dodge Charger, VIN: 2C3CDXL93JH328602; and
- one 2012 Mercedes-Benz CLS;

b. the following firearms, firearm accessories, and ammunition seized by DEA on or about December 9, 2022:

- one Sig Sauer SP2340 .40 caliber pistol with magazine and 33 rounds of ammunition;
- one Springfield Armory XDM Elite 10mm pistol with magazine and 13 rounds of ammunition;
- one CZ 7.62x25 pistol with magazine and six rounds of ammunition;
- one Panzer Arms BP-12 12 gauge Shotgun with drum magazine and 16 rounds of ammunition;
- one PW Arms Yugo M59/66 7.62x39 rifle; and
- one privately made firearm 7.62 caliber rifle with drum magazine and 25 rounds of ammunition;

Upon conviction of the offense alleged in Count 8, JESSE JAMES BAILEY, THOMAS CARVER, and ANNA SARNES shall each forfeit to the United States,

1 pursuant to Title 21, United States Code, Section 853, any property that constitutes or is  
2 traceable to proceeds of the offense, as well as any property that facilitated the offense.

3       Upon conviction of the offense alleged in Count 9, THOMAS CARVER,  
4 ANTHONY ESCOTO, and WILLIAM TRIPP shall each forfeit to the United States,  
5 pursuant to Title 21, United States Code, Section 853, any property that constitutes or is  
6 traceable to proceeds of the offense, as well as any property that facilitated the offense.

7 This property includes, but is not limited to:

- 8       a. one Glock 26 9mm pistol bearing serial number BEDF842 with two magazines  
9       and 30 rounds of ammunition, seized by DEA on or about December 14, 2022.

10       Upon conviction of the offense alleged in Count 10, GUSTAVO  
11 CASTELLANOS-TAPIA shall forfeit to the United States, pursuant to Title 21, United  
12 States Code, Section 853, any property that constitutes or is traceable to proceeds of the  
13 offense, as well as any property that facilitated the offense.

14       Upon conviction of the offense alleged in Count 11, THOMAS CARVER shall  
15 forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any  
16 property that constitutes or is traceable to proceeds of the offense, as well as any property  
17 that facilitated the offense.

18       Upon conviction of the offense alleged in Count 12, RONALDO MCCOMB shall  
19 forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any  
20 property that constitutes or is traceable to proceeds of the offense, as well as any property  
21 that facilitated the offense.

22 //

23

24 //

25

26 //

27

**Substitute Assets.** If any of the above-described forfeitable property, as a result of any act or omission of the defendants,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek the forfeiture of any other property of the defendant, up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL:

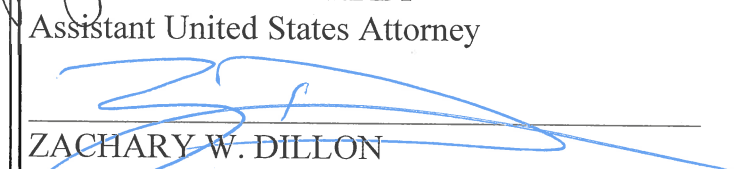
DATED: 3/16/23

*Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States.*

FOREPERSON

  
NICHOLAS W. BROWN  
United States Attorney

  
VINCENT T. LOMBARDI  
Assistant United States Attorney

  
ZACHARY W. DILLON  
Assistant United States Attorney

  
MAX B. SHINER  
Assistant United States Attorney